

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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DONALD C. HUTCHINS

Plaintiff

v.

CARDIAC SCIENCE, INC., et al.,

Defendants

U.S. DISTRICT COURT
DISTRICT OF MASS

Civil Action: **04-30126-MAP**

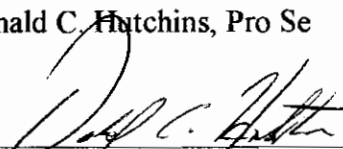
**PLAINTIFF'S ANSWER TO DEFENDANT'S MOTION TO STRIKE
PLAINTIFF'S MOTION FOR SANCTIONS PURSUANT TO LOCAL RULE 1.3**

The Plaintiff, Donald C. Hutchins ("Hutchins") requested that this Honorable Court apply sanctions as appropriate against Defendants' Counsel, under Local Rule 1.3. This motion for sanctions was not directed against Cardiac Science, Inc. The motion for sanctions was directed against Attorney Randall T. Skaar ("Skaar") and the attorneys representing the Compliant Corporation ("Compliant"). Exhibits accompanying the motion for sanctions document an ongoing conspiratorial relationship between Skaar and the Defendant Compliant.

Validation for sanctions can be found in the awarding of sanctions to Hutchins against these same attorneys in Ohio Case No. CV-04-540066 as docketed in Exhibit A attached. Support for the Ohio award can be found in the affidavit of Donald C. Hutchins attached herein as Exhibit B.

The Plaintiff
Donald C. Hutchins, Pro Se

Dated, August 22, 2006

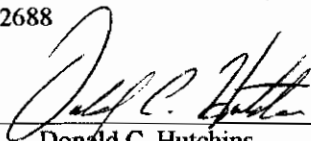


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(413) 567-0606

CERTIFICATE OF SERVICE

I, Donald C. Hutchins, 1047 Longmeadow Street, Longmeadow, Massachusetts 01106, hereby certify that I served a copy of the foregoing on the appropriate party by sending a copy by first class mail to: Randall T. Skaar, Esq., Patterson, Thente, Skaar & Christensen, P.A., 4800 IDS Center, 80 South Eighth St., Minneapolis, MN 55402. Paul T. Rothschild, Esq., Bacon & Wilson P.C., 33 State Street, Springfield, MA 01103 John J. Egan, Esq., Egan, Flanagan and Cohen, P.C., 67 Market Street, Springfield, MA 01102-9035, Jeffrey Lauderdale, Esq., Calfee, Halter & Griswold LLP, 1400 Mc Donald Investment Center, 800 Superior Ave., Cleveland, OH 44114-2688

Dated: August 22, 2006


Donald C. Hutchins